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January 6, 2025

**VIA CM/ECF ONLY**

Hon. Mitchell J. Katz  
U.S. Magistrate Judge  
U.S. District Court, Northern District of New York  
100 S. Clinton Street  
Syracuse, New York 13261

**RE: COMPAGNI v. TOWN OF CORTLANDVILLE, ET AL**  
**Case No : 5:20-CV-00489 – GTS-ATB**

Dear Judge Katz:

I write this letter to request an extension of the deadline to file dispositive motions in this case. Presently, pursuant to Your Honor's text order dated October 30, 2024 (Document No. 89), dispositive motions are to be filed by January 27, 2025. After the deadline was set, on November 25, 2024, an in-person settlement conference/mediation was scheduled to take place on January 15, 2025 before Your Honor.

We respectfully request that the dispositive motion deadline be extended to forty-five (45) days after the settlement conference/mediation. We are optimistic that the settlement conference/mediation will be productive and would like to avoid spending time and money on dispositive motions (which are anticipated and would need to be started prior to the January 15, 2025 settlement conference/mediation) if settlement is possible. Attached is an e-mail exchange where this was discussed with opposing counsel, who does not object.

Thank you for your consideration. We would be happy to discuss this request with Your Honor if necessary.

Respectfully Submitted,

**NASH CONNORS, P.C.**

*/s/ Philip M. Gulisano*

Philip M. Gulisano  
[gulisano@nashconnors.com](mailto:gulisano@nashconnors.com)

Enc.

cc. Jesse Ryder, Esq. (via CM/ECF only)

**Philip M. Gulisano**

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**From:** Kimberly Carrow <kimberly\_carrow@nynd.uscourts.gov>  
**Sent:** Friday, November 15, 2024 3:00 PM  
**To:** Jesse Ryder; Philip M. Gulisano  
**Subject:** RE: Compagni v. Cortlandville, et al

Yes, please file a letter on the docket.



**Kimberly Carrow**  
**Courtroom Deputy to the**  
**Hon. Mitchell J. Katz, U.S. Magistrate Judge**  
Northern District of New York  
100 S. Clinton Street, Syracuse NY 13261  
kimberly\_carrow@nynd.uscourts.gov  
315-234-8633

**From:** Jesse Ryder <ryderlawfirm@gmail.com>  
**Sent:** Friday, November 15, 2024 1:56 PM  
**To:** Philip M. Gulisano <gulisano@nashconnors.com>  
**Cc:** Kimberly Carrow <kimberly\_carrow@nynd.uscourts.gov>  
**Subject:** Re: Compagni v. Cortlandville, et al

**CAUTION - EXTERNAL:**

No objection

**Ryder Law Firm**

Jesse P. Ryder, Esq.  
6739 Myers Road  
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On Fri, Nov 15, 2024 at 1:49 PM Philip M. Gulisano <[gulisano@nashconnors.com](mailto:gulisano@nashconnors.com)> wrote:

OK, thank you. From the defendants' perspective, we were trying to see if we could resolve this matter before we dedicated extensive resources into making a motion for summary judgment, which would be due in January. I would ask the court if it would be willing to extend the deadline for dispositive motions so that they could be made at some point after the mediation, in the event the case does not settle.

Thank you.

Phil

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**Philip M. Gulisano, Esq.**

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**From:** Kimberly Carrow <[kimberly\\_carrow@nynd.uscourts.gov](mailto:kimberly_carrow@nynd.uscourts.gov)>

**Sent:** Friday, November 15, 2024 1:32 PM

**To:** Jesse Ryder <[ryderlawfirm@gmail.com](mailto:ryderlawfirm@gmail.com)>

**Cc:** Philip M. Gulisano <[gulisano@nashconnors.com](mailto:gulisano@nashconnors.com)>

**Subject:** RE: Compagni v. Cortlandville, et al

I'll have to send dates for in January. The court is only available on 12/18.